

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE SEP - 9 1985

SUBJECT Site Operations Plan - National Gypsum Company

36900

FROM *Lisa Gatton*
Lisa Gatton, Quality Assurance Chemist
Monitoring Management BranchTO Nigel Robinson, Project Officer
Site Investigation and Compliance Branch

I am sending you additional recommendations for this project plan as I related to you in our phone conversation of August 29, 1985. Enclosed please find a copy of comments made concerning the asbestos sampling portion of the plan. The aquatic impact assessment portion was reviewed by qualified personnel; however, specific comments are not enclosed.

We have found this plan, as a whole, to be extremely unspecific and lacking in completeness. There is very little background on the sites and it is not always clear what will be going on at each site. A map is presented for the ground water monitoring at the Millington site, but for no other. The subsurface soil and waste sampling plan is biased. We prefer to see random sampling. It is not clear if soil sampling will go on anywhere but at Millington. The aquatic impact statement is undetailed. We want to see an exact design plan along with what size sieve will be used, what preservation will be used, etc.

For this reason, I request that the entire plan be revised by adding more background and detail. The comments enclosed here along with those in the memo I sent you dated August 22, 1985 should be helpful. It is not within our scope of work to provide all the points necessary to revise this plan. That would be extremely time consuming. However, if you have any questions feel free to call me at FTS 340-6676.

I am, therefore, notifying you that this project plan is unacceptable as it stands and that I await the submittal of a revised plan for the National Gypsum Sites.

Enclosure